

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

USA,)	
	Plaintiff,)	
)	CASE NO. 15 CR 10145-RGS
v.)	
)	
)	
BRANDI WILLIAMS,)	
	Defendant)	

**DEFENDANT BRANDI WILLIAMS' MOTION FOR ADDITIONAL TIME
TO FILE CERTIFICATION OF TITLE**

NOW COMES Defendant, Brandi Williams, through counsel, and hereby moves this Honorable Court to modify the conditions of her release to extend the deadline for the completion of the surety's Certification of Title from July 8, 2015 to July 10, 2015. In support thereof, counsel states the following:

1. This Court released Ms. Williams with the condition that the surety complete all documents securing the \$200,000.00 real estate bond by July 8, 2015.
2. Counsel has provided signed originals of the Escrow Agreement, Quitclaim Deed and Mortgage to the Assistant United States Attorney.
3. However, because of the holiday weekend, counsel was unable to engage a real estate law firm to prepare the Certification of Title in time to meet the July 8, 2015 deadline and an additional 2 days will be necessary.

WHEREFORE, the Defendant urges the Court to modify his pretrial release as requested.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "P. C. Horstmann".

Peter Charles Horstmann, Esq.
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CERTIFICATE OF SERVICE

I, Peter Charles Horstmann, Esquire, hereby certify that on this 8th day of July, 2015, a copy of the foregoing was electronically served upon Assistant United States Attorney Emily Cummings, Office of the United States Attorney, One Courthouse Way, Boston, Massachusetts, 02210

A handwritten signature in blue ink, appearing to read "P. C. Horstmann".

Peter Charles Horstmann, Esquire